

**BURSOR & FISHER, P.A.**

Neil J. Deckant (State Bar No. 322946)  
1990 North California Boulevard, Suite 940  
Walnut Creek, CA 94596  
Telephone: (925) 300-4455  
E-Mail: ndeckant@bursor.com

*Attorney for Plaintiff*

**BELLATRIX LAW, P.C.**

Brianna K. Pierce (State Bar No. 336906)  
16868 Via Del Campo Ct., Ste 100  
San Diego, California 92127  
Telephone: (858) 338-5650  
E-Mail: bkp@bellatrix-law.com

*Attorney for Defendant Kaizencure*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

JWAL SHELAT, individually and on  
behalf of all other similarly situated,

Plaintiff,

v.

KAIZENCURE LLC, d/b/a CRAFTORIA,

Defendant.

Case No. 3:24-cv-04696-AMO

Hon. Araceli Martínez-Olguín

**JOINT STIPULATION AND  
PROPOSED ORDER REGARDING  
DISCOVERY**

WHEREAS, on January 9, 2025, Defendant filed a Motion to Stay Discovery (the “Motion”) [DE 31] pending the resolution of its Motion to Dismiss [DE 27]; and

WHEREAS, as of January 31, 2025, Defendant’s Motion is fully briefed and ripe for decision; and

WHEREAS, the undersigned Parties met and conferred to discuss the current discovery schedule in light of the pending Motion:

IT IS HEREBY STIPULATED AND AGREED THAT, subject to the Court’s approval:

1. All deadlines for discovery are stayed pending resolution of Defendant’s Motion.
2. No later than two weeks after the Court issues an order resolving Defendant’s Motion, the Parties shall file an updated Joint Case Management Statement and Proposed Case Management Order with the Court.

1  
2 Dated: February 18, 2025

Respectfully submitted,

3 /s/ Neal J. Deckant

/s/ Brianna K. Pierce

4 Neal J. Deckant (State Bar No. 322946)  
5 **BURSOR & FISHER, P.A.**  
6 1990 North California Boulevard, Suite 940  
7 Walnut Creek, CA 94596  
8 Telephone: (925) 300-4455  
9 Facsimile: (925) 407-2700  
10 E-Mail: ndeckant@bursor.com

Brianna K. Pierce (State Bar No. 336906)  
**BELLATRIX LAW, P.C.**  
16868 Via Del Campo Ct., Ste 100  
San Diego, California 92127  
Telephone: (858) 338-5650  
E-Mail: bkp@bellatrix-law.com

11 *Attorney for Plaintiff*

Eric S. Rosen (*pro hac vice*)  
**DYNAMIS LLP**  
225 Franklin St., 26th Floor  
Boston, Massachusetts 02110  
Telephone: (617) 802-9157  
E-Mail: erosen@dynamisllp.com

Constantine P. Economides (*pro hac vice*)  
**DYNAMIS LLP**  
1111 Brickell Avenue  
Miami, Florida 33131  
Telephone: (305) 985-2959  
E-Mail: ceconomides@dynamisllp.com

*Attorneys for Defendant*

**Attestation Pursuant to Civil Local Rule 5-1(i)**

Pursuant to Civil Local Rule 5-1(i)(3), the filer of this document hereby attests that concurrence in the filing of the document has been obtained from each of the other Signatories.

Dated: February 18, 2025

Respectfully submitted,

/s/ Brianna K. Pierce

**CERTIFICATE OF SERVICE**

No. 3:24-cv-04696-AMO

I certify that I served a copy of this document on the Court and all parties by filing this document with the Clerk of the Court through the CM/ECF system, which will provide electronic notice and an electronic link to this document to all counsel of record.

Dated: February 18, 2025

Respectfully submitted,

/s/ Brianna K. Pierce

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8 **UNITED STATES DISTRICT COURT**  
9 **NORTHERN DISTRICT OF CALIFORNIA**

10 JWAL SHELAT, individually and on  
11 behalf of all other similarly situated,

12 Plaintiff,

13 v.

14 KAIZENCURE LLC, d/b/a CRAFTORIA,

15 Defendant.

Case No. 3:24-cv-04696-AMO

Hon. Araceli Martínez-Olguín

**[PROPOSED] ORDER REGARDING  
DISCOVERY**

16 The Court, having considered the parties' Joint Stipulation Regarding Discovery, and with  
17 good cause appearing, hereby orders as follows:

18 1. All deadlines for discovery are stayed pending resolution of Defendant's Motion to  
19 Stay Discovery [DE 31].

20 2. No later than two weeks after the Court issues an order resolving Defendant's  
21 Motion to Stay Discovery [DE 31], the Parties shall file an updated Joint Case Management  
22 Statement and Proposed Case Management Order with the Court.

23  
24 Date: \_\_\_\_\_

\_\_\_\_\_  
25 Hon. Araceli Martínez-Olguín  
26 United States District Judge  
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